BEFORE THE TENNESSEE REGULATORY AUTHORITY

2004 HAR 22 PH C: 53

In the Matter of	T.R.A. DOCKET ROOM
Joint Petition for Arbitration of	I.N.A. DUGALI KUGH
NEWSOUTH COMMUNICATIONS CORP., NUVOX COMMUNICATIONS, INC KMC TELECOM V, INC, KMC TELECOM III LLC, and XSPEDIUS COMMUNICATIONS, LLC on Behalf of its Operating Subsidiaries XSPEDIUS MANAGEMENT CO SWITCHED SERVICES, LLC and Xspedius Management Co of CHATTANOOGA, LLC	Docket No 04-00046
Of an Interconnection Agreement with BellSouth Telecommunications, Inc. Pursuant to Section 252(b) of the Communications Act of 1934, as Amended	

JOINT PETITIONERS MOTION FOR LEAVE TO FILE REPLY

NewSouth Communications Corp ("NewSouth"), NuVox Communications, Inc ("NuVox"), KMC Telecom V, Inc ("KMC V") and KMC Telecom III LLC ("KMC III") (collectively, "KMC"), and Xspedius Communications, LLC on behalf of its operating subsidiaries Xspedius Management Co Switched Services, LLC ("Xspedius Switched") and Xspedius Management Co. of Chattanooga, LLC ("Xspedius Management") (collectively, "Xspedius") (collectively, the "Joint Petitioners" or "CLECs"), by their attorneys respectfully move the Tennessee Regulatory Authority ("TRA") for leave, pursuant to TRA Rule 1220-1-2-06(3), to file a Reply to BellSouth's Reply to Petitioners' Response to BellSouth's Motion to Sever ("Reply") A copy of the Joint Petitioners' proposed Reply is attached hereto

Joint Petitioners respectfully submit this Motion and proposed Reply to help the TRA in resolving these issues The TRA should have the benefit of all relevant information that bears on the issues presented in the Petition

For the foregoing reasons, Joint Petitioners respectfully request that the TRA grant Joint Petitioners leave to file the proposed Reply

Respectfully submitted,

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Counsel for the Joint Petitioners

Certificate of Service

The undersigned hereby certifies that a true and correct copy of the foregoing has been forwarded via U S Mail, first class postage prepaid, to the following, this 22nd day of March, 2004

Guy Hicks, Esq BellSouth Telecommunications, Inc. 333 Commerce Street, Suite 2101 Nashville, TN 37201

H. M. Batti H. LaDon Baltimore